

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 05-10035 PBS (MBB)
)	
MARYSOL MORALES)	
_____)	

ASSENTED TO MOTION FOR ENLARGEMENT OF TIME
AND FOR EXCLUSION OF TIME FROM SPEEDY TRIAL CALENDAR

The United States hereby moves (with the defendant's assent) for an enlargement of time until October 12, 2005, at 10:00 for the Status Conference in this case. The status conference is currently scheduled for September 27, 2005, at 2:30 pm.

As grounds for this motion, undersigned counsel notes that he is scheduled to appear on September 27, 2005, at 2:00 pm, for the sentencing hearing in United States v. Carlos Gomez and Mary Gildea, Criminal No. 05-cr-10022-GAO.

With defendant's assent, the United States further moves for an order pursuant to Title 18, United States Code, Section 3161(h)(8)(A), excluding the period from September 27, 2005, through October 12, 2005, from the computation of time within which the trial in this case must commence.

An order permitting such exclusion may properly be entered based upon a finding by the Court that the ends of justice served by granting such an exclusion outweigh the best interests of the public and the defendant in a speedy trial. As grounds for such a finding, the United States notes that the parties have conferred and have agreed – in order to facilitate the

orderly preparation of this case for trial – that the United States will make limited disclosure of materials that would ordinarily be subject to automatic discovery at a later date. The interests of justice warrant allowing counsel adequate time, in light of their other professional commitments, to determine which materials will be disclosed and to allow a full review of those materials, before defendant is required to make final determinations as to whether any motions under Fed. R. Crim. P. 12(c) are warranted.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

dated: September 20, 2005

By: /s/ Paul G. Levenson
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